

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ANCHORAGE SNF, LLC d/b/a \*  
ANCHORAGE HEALTHCARE CENTER, *et al.*, \*  
Plaintiffs,  
\*  
v. Case No.: 1:22-cv-00166-JRR  
\*  
RAFAEL J. LÓPEZ, in his official  
capacity as the MARYLAND SECRETARY \*  
OF HUMAN SERVICES, *et al.*, \*  
\*  
Defendants.  
\* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

**STIPULATION OF DISMISSAL**

Plaintiffs, Anchorage SNF, LLC and all of the other named Plaintiffs<sup>1</sup> and Defendant Rafael J. López, in his official capacity as the Secretary of the Maryland Department of Human Services, and Laura Herrera Scott, in her official capacity as the Secretary of the Maryland Department of Health, by and through undersigned counsel, hereby jointly stipulate to the dismissal of this action, without prejudice, in accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, each party to bear its own costs.

[REMAINDER OF PAGE LEFT BLANK INTENTIONALLY]

---

<sup>1</sup> There are 17 named Plaintiffs. All of the Plaintiffs' names are set forth in the Complaint. (ECF 1)

Respectfully submitted,

/s/ Charles J. Brown, III

Charles J. Brown (Bar # 2817)  
Gellert, Seitz, Busenkell & Brown, LLC  
1201 N. Orange Street, 3rd Floor  
Wilmington, DE 19801  
Tel. (302) 425-5813  
Fax: (302) 425-5814  
[cbrown@gsbblaw.com](mailto:cbrown@gsbblaw.com)  
*Attorney for Plaintiffs*

ANTHONY G. BROWN  
ATTORNEY GENERAL OF  
MARYLAND

/s/ Ann D. Ware

Robert L. Durocher, Jr. (Bar # 27116)  
Ann D. Ware (Bar # 23785)  
Assistant Attorneys General  
Maryland Department of Human Svrs.  
25 S. Charles Street, 10<sup>th</sup> Floor  
Baltimore, Maryland 21201  
Tel: (410) 767-7765  
Fax: (410) 333-0026  
[robert.durocher@maryland.gov](mailto:robert.durocher@maryland.gov)  
[ann.ware1@maryland.gov](mailto:ann.ware1@maryland.gov)  
*Attorneys for Defendant*  
*Rafael J. López*

ANTHONY G. BROWN  
ATTORNEY GENERAL OF  
MARYLAND

/s/ Meghan Lambert

Meghan Lambert, Esquire  
Admitted Pro Hac Vice  
1426 N. Third Street, Suite 120  
P.O. Box 5400  
Harrisburg, PA 17110  
Direct: (717) 433-4745  
Fax: (717)909-5925  
[mlambert@sb2inc.com](mailto:mlambert@sb2inc.com)  
*Attorney for Plaintiffs*

/s/ Benjamin Bor

Nicole Lugo Clark (Bar # 26983)  
Benjamin Bor (Bar # 30633)  
Assistant Attorneys General  
Maryland Department of Health  
300 W. Preston Street, Suite 302  
Baltimore, Maryland 21201  
Tel: (410) 767-1862  
Fax: (410) 333-7894  
[benjamin.bor@maryland.gov](mailto:benjamin.bor@maryland.gov)  
[nicole.lugoclark@maryland.gov](mailto:nicole.lugoclark@maryland.gov)  
*Attorneys for Defendant*  
*Laura Herrera Scott*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 27<sup>th</sup> day of January 2025, a copy of the foregoing Stipulation of Dismissal was electronically filed and served on all those entitled to electronic service.

/s/ Charles J. Brown, III  
Charles J. Brown (Bar # 2817)